

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA

In re: Kenneth Allen Bardwell and Crystal
Dawn Bardwell,

Debtors.

Case No. 09-16311
Chapter 13

**Motion to Modify Chapter 13 Plan, Response to Trustee's Motion to Dismiss and Request
for Compensation**

Debtors move this Court to increase their Chapter 13 Plan payment to \$700 per month beginning in June, 2011. In support Debtors would show the Court:

1. Debtors filed their Chapter 13 Bankruptcy on November 4, 2009 and the Plan was confirmed on March 9, 2010.
2. The Monthly mortgage payment has increased from \$310.00 to \$422.95 per month causing the Plan to no longer be feasible.
3. The Trustee filed a Motion to Dismiss on May 2, 2011.
4. Debtors wish to increase their plan payment to \$700 beginning with the June 2011 plan payment to bring the Plan back into feasibility.
5. Debtors attorney requests a \$350.00 attorney fee for this Motion and the subsequent Order which will be entered.

Wherefore the Debtors request this Court increase their plan payment to \$700 per month beginning in June 2011 and grant Debtors attorney a \$350.00 attorney fee.

/s/Margaret Travis

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/s/ Chrystal Dawn Bardwell

Crystal Dawn Bardwell, Co-Debtor

/s/Kenneth Allen Bardwell

Kenneth Allen Bardwell, Debtor